
**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of the)	
)	
Telecommunications Carriers Eligible for)	WC Docket No. 09-197
Universal Service Support)	
)	WC Docket No. 11-42
Lifeline and Link Up Reform and Modernization)	
)	
Blanket Forbearance Compliance Plan)	

TELE CIRCUIT NETWORK CORPORATION'S AMENDED COMPLIANCE PLAN
(WIRELESS)

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I. INTRODUCTION

Tele Circuit Network Corporation (“Tele Circuit” or the “Company”) provides prepaid wireless telecommunications services and is seeking designation as an Eligible Telecommunications Carrier (“ETC”) solely for the purpose of participating in the Lifeline program. Although Section 214(e)(1)(A) of the Act requires an ETC to offer USF-supported services to some extent over its own facilities, the Federal Communications Commission (“FCC” or “Commission”) has forbore from that requirement for carriers that are, or seek to become, Lifeline-only ETCs.¹ For its wireless services, Tele Circuit will avail itself of the FCC’s conditional grant of forbearance and, by its attorney, hereby files its Amended Compliance Plan outlining the measures it will take to

¹ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Order*”).

implement the conditions of forbearance outlined in the *Order*.² For the Commission's convenience, this Amended Compliance Plan replaces, in its entirety, the Compliance Plan as originally filed on February 15, 2012. Given the severe economic environment that is forcing many low-income customers to forego wireless service, Tele Circuit respectfully requests expeditious approval of this plan so that the Company, upon designation as an ETC, may quickly deploy much-needed Lifeline services to qualified low-income customers.

II. BACKGROUND

In the *Order*, the Commission granted forbearance from the "own-facilities" requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:³

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan that: (a) outlines the measures the carrier will take to implement the obligations contained in this Order, including but not limited to the procedures the ETC follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Fund, materials related to initial and ongoing certifications and sample marketing materials, as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary; and (b) provides a detailed description of how the carrier offers service, the geographic areas in which it offers service, and a description of the carrier's various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available.

² This Compliance Plan applies only to the Company's wireless services. Although the Company qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A), the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state, particularly for purposes of state universal service funding under state program rules and requirements.

³ See *Order* at ¶¶ 368, 373 and 379.

III. TELE CIRCUIT WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER

Tele Circuit will comply with all conditions set forth in the *Order*, the provision of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout the United States.

A. Access to 911 and E911 Services

In the *Order*, the Commission requires Tele Circuit to provide its Lifeline customers with access to 911 and E911 services, regardless of activation status and availability of minutes.⁴ The Commission and consumers are hereby assured that all Tele Circuit customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Tele Circuit handsets even if the account associated with the handset has no minutes remaining.

B. E911-Compliant Handsets

The Commission also conditioned its grant of forbearance determination on Tele Circuit providing only E911-compliant handsets to its Lifeline customers.⁵ Tele Circuit will ensure that all handsets used in connection with the Company's Lifeline service offering are E911-compliant. In the event that an existing Tele Circuit customer does not have an E911-compliant handset, the Company will replace it with a new 911/E911-compliant handset at no charge to the customer. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well.

C. Consumer Eligibility and Enrollment

Tele Circuit will certify and verify consumer eligibility for Lifeline in accordance with the requirements set forth in the *Order*. In instances where a state agency or third-party

⁴ See *Order* at ¶ 373.

⁵ See *id.*

administrator is responsible for the initial determination and annual recertification of consumer eligibility, Tele Circuit will rely on the state identification or database.⁶ In instances where Tele Circuit is responsible for the initial determination and annual recertification of consumer eligibility, the Company will follow the procedures set forth below.

1. One-Per-Household

Tele Circuit understands that Lifeline is limited to a single subscription per household, and that the Commission has defined household as “any individual or group of individuals who are living together at the same address as one economic unit.”⁷ Upon receiving an application for Lifeline support, Tele Circuit will check the duplicates database, once in place, to determine whether an individual at the applicant’s residential address is currently receiving Lifeline-supported service. Tele Circuit will also search its own internal database of active customers, real-time, pre-sale, to ensure that it does not already provide Lifeline-supported service to someone at that residential address. If Tele Circuit determines that an individual at the applicant’s address is currently receiving Lifeline-supported service, Tele Circuit will take an additional step to ensure that the applicant and the current subscriber are part of different households. To enable applicants to make this demonstration, Tele Circuit will require applicants to complete and submit to the Company USAC’s one-per-household template, which will contain the following: (1) an explanation of the Commission’s one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant’s household and share in the household’s expenses or benefit from the applicant’s income; and (4) the penalty for a

⁶ See Order at ¶ 98.

⁷ See Order at ¶ 74.

consumer's failure to make the required one-per-household certification (i.e., de-enrollment).⁸ Tele Circuit will deny the Lifeline application of any individual residing at the same address as a current Lifeline subscriber who is part of the same household, and will advise the applicant of the basis for the denial.

On its certification forms, a draft sample of which is attached,⁹ Tele Circuit will obtain a consumer's permanent residential address (which cannot be a P.O. Box or General Delivery address), unless they only have a temporary address, and a billing address for the service, if different (which may include a P.O. Box or General Delivery address).¹⁰ Tele Circuit will inquire on its certification forms whether or not the applicant's address is a temporary one.¹¹ If it is, Tele Circuit will notify the consumer that the Company will contact the consumer every 90 days, by phone or text, to verify that he or she continues to rely on that address, and that if the consumer fails to respond within 30 days of Tele Circuit's attempt to verify the temporary address, he or she will be de-enrolled from the Lifeline program. Also on its certification forms, Tele Circuit will explain that if the subscriber moves, they must provide their new address to the Company within 30 days of moving.¹² If the subscriber has moved, Tele Circuit will update the duplicates database, once in place, with the information within 10 business days of receipt of the information.¹³

As detailed below, Tele Circuit's certification form will clearly explain the one-per-household requirement and all consumers must certify that they receive Lifeline support for a single subscription per household. Tele Circuit personnel also will inform each Lifeline

⁸ See *Order* at ¶ 78.

⁹ See Exhibit A. The draft form remains subject to change, but substantially reflects the content of the Company's application.

¹⁰ See *Order* at ¶ 85.

¹¹ See *Order* at ¶ 89.

¹² See *Order* at ¶ 85.

¹³ See *id.*

applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported service," and ability to determine whether he or she is already benefiting from Lifeline support.

2. Initial and Annual Certification

Consumers will be signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to the Company website, which will provide information regarding the Company's Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. Tele Circuit's application form will identify that it is a "Lifeline" application. Tele Circuit will provide Lifeline-specific training to all personnel, whether employees, agents or representatives, that interact with actual or prospective consumers with respect to obtaining, changing or terminating Lifeline services.

Tele Circuit's initial and annual certification forms will conform to the list of requirements provided in the *Order*, Appendix C and with C.F.R. § 54.410(d), as amended. Tele Circuit's Lifeline certification forms, a draft sample of which is attached as Exhibit A, will require each prospective subscriber to provide the following information:

- (i) The subscriber's full name;
- (ii) The subscriber's full residential address;
- (iii) Whether the subscriber's residential address is permanent or temporary;
- (iv) The subscriber's billing address, if different from the subscriber's residential address;
- (v) The subscriber's date of birth;
- (vi) The last four digits of the subscriber's social security number, or the subscriber's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a social security number;
- (vii) If the subscriber is seeking to qualify for Lifeline under the program-based criteria, as set forth in § 54.409, the name of the qualifying assistance program from which the subscriber, his or her dependents, or his or her household receives benefits; and
- (viii) If the subscriber is seeking to qualify for Lifeline under the income-based criterion, as set forth in § 54.409, the number of individuals in his or her household.

The certification forms will also explain in clear, easily understandable language that:

- (i) Lifeline is a federal benefit;
- (ii) Lifeline service is available for only one line per household;
- (iii) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses;
- (iv) households are not permitted to receive benefits from multiple providers;
- (v) that violation of the one-per-household requirement would constitute a violation of the Commission's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government; and
- (vi) a Lifeline subscriber may not transfer his or her service to any other individual, including another eligible low-income consumer.

Tele Circuit will require all consumers, at sign up and annually thereafter, to certify under penalty of perjury that:

- (i) The subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline, provided in § 54.409;
- (ii) The subscriber will notify the carrier within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit.
- (iii) If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands, as defined in 54.400(e);
- (iv) If the subscriber moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within 30 days;
- (v) If the subscriber provided a temporary residential address, he or she will be required to verify his or her temporary residential address every 90 days;
- (vi) The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
- (vii) The information contained in the subscriber's certification form is true and correct to the best of his or her knowledge,
- (viii) The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and
- (ix) The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to § 54.405(e)(4).

Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility requirements. Consumers who do not complete the application process in person must return the signed application and support

documentation to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures, including Interactive Voice Response (IVR) recordings, that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006,¹⁴ and any applicable state laws. Processing of consumers' applications, including review of all application forms and relevant documentation, will be performed under the Company's supervision by managers experienced in the administration of the Lifeline program.

The Company will primarily enroll Lifeline applicants in person at a retail store. When a prospective customer applies in store, a Company agent will ask to see a government issued ID and will validate the address via a USPS/Melissa Database and simultaneously input the name/address combination into CGM, LLC's aggregate duplicate database (see section III.D below) to confirm that the applicant is not already receiving a Lifeline subsidy from Tele Circuit or any other CGM client. In cases where an eligibility database exists, store personnel will contact the Company's internal group dedicated to verifying eligibility who will query the database and either approve or deny the applicant. In states where eligibility databases are not available, Company agents, who are trained on what is eligible documentation, will witness documentation showing proof of the applicant's participation in one of the Lifeline eligible programs or proof that their annual household income is at or below 135% of the federal poverty guidelines, and will sign the application demonstrating they have witnessed the documentation. Eligibility documents are returned to the customer after review. Finally, Tele Circuit agents will verbally explain the certifications to consumers before they initial the required disclosures and sign the application. Upon successful completion of the certification process, the customer is allowed to choose a service plan and receive their free phone in store. In instances where eligibility databases cannot be accessed in real-time, Tele Circuit will mail the phone to the customer once verification of eligibility is complete. The

¹⁴ See *Order* at ¶ 168.

customer's account is then activated upon the customer's personal initiation or actual use of the phone.

Tele Circuit may also enroll customers at community events, in which case the protocol for signing up customers closely resembles the process in store. Company employees, agents or representatives are able to access necessary databases (USPS/Melissa, duplicates database, eligibility databases) to verify eligibility, and, when required, can personally review eligibility based on proof of income or program participation. Company personnel are able to verbally review the required disclosures with applicants and obtain the completed application form in person. Phones are delivered upon successful completion of the certification process, as detailed above.

With respect to those enrolling via the phone, Company personnel are able to verbally explain the Lifeline program and its eligibility requirements, including required information and disclosures, as well as collect and input electronically the application form information and obtain the applicant's signature via IVR. The Company then has the information needed to qualify the applicant by accessing necessary databases (USPS/Melissa, duplicates database, eligibility databases). Upon receipt of copies of the applicant's proof documentation, if applicable, and government-issued ID, Tele Circuit is able to complete the eligibility verification process and deliver phones to eligible customers by mail.

When enrolling via the Internet, prospective customers will be able to fill out an application form online and sign electronically. Tele Circuit will highlight the certifications that are required, for example, by requiring consumers to acknowledge each certification before moving on to the next field.¹⁵ The Company will qualify the applicant by accessing necessary databases (USPS/Melissa, duplicates database, eligibility databases). Upon receipt of copies of the applicant's proof documentation, if applicable, and government-issued ID, Tele Circuit is able to

¹⁵ See *Order* at ¶ 123.

complete the eligibility verification process and deliver phones to eligible customers by mail.

Tele Circuit provides employees, agents, and representatives with training designed to give them an understanding of Lifeline program requirements and permit them to review customer documentation and determine whether it is sufficient to establish a customer's eligibility to participate in the Lifeline program under the Commission's rules. No Company employee, agent, or representative may accept a Lifeline application unless he or she has first completed this training program and demonstrated an understanding of the underlying material. Among other things, the Lifeline program training discusses the Company's Lifeline application form (see Exhibit A) on a section-by-section basis. The training explains what sections of the form must be completed by the customer and reviews the form disclosures in detail, to facilitate an employee's ability to explain each item contained therein and answer any customer questions.

Tele Circuit will determine eligibility utilizing the income and program criteria currently utilized by federal default states (47 C.F.R. § 54.409(a),(b)), as well as any additional state-specific criteria. Prior to enrolling a new subscriber, Tele Circuit will check the eligibility of low-income consumers first by accessing state or federal social services electronic eligibility databases, where available.¹⁶ If a database is used to establish eligibility, Tele Circuit will not require documentation of the consumer's participation in a qualifying federal program; instead, Tele Circuit or its representative will note in its records what specific data was relied upon to confirm the consumer's initial eligibility for Lifeline.¹⁷ However, in states where there is no state administrator, the state commission or other state agency is not making eligibility determinations, and there is no automated means for Tele Circuit to check electronic databases for eligibility, Tele Circuit will review documentation to determine eligibility for new subscribers

¹⁶ See Order at ¶ 97.

¹⁷ See Order at ¶ 98.

until such time as a qualifying eligibility database is available.¹⁸ Tele Circuit will require acceptable documentation both for income eligibility and for program eligibility. The Company will not retain copies of the documentation but rather will establish policies and procedures to review such documentation and keep accurate records detailing how the consumer demonstrated his or her eligibility.¹⁹ Where Tele Circuit personnel conclude that proffered documentation is insufficient to establish such eligibility, Tele Circuit will deny the associated application and inform the applicant of the reason for such rejection. In the event that Tele Circuit personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel at Tele Circuit's corporate headquarters. Tele Circuit understands that it may permit agents or representatives to review documentation of consumer program eligibility for Lifeline, and in such cases Tele Circuit remains liable for ensuring the agent or representative's compliance with the Lifeline program rules.²⁰

3. Annual Re-Certification

Tele Circuit understands that it must re-certify the eligibility of its entire Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013, and the Company may elect to perform this re-certification on a rolling basis throughout the year.²¹ By December 31, 2012, Tele Circuit will re-certify the continued eligibility of all of its subscribers by contacting them—either in person, in writing, by phone, by text message, by email, or otherwise through the Internet—to confirm their continued eligibility.²² The re-certification notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company.

¹⁸ See *Order* at ¶ 99.

¹⁹ See *Order* at ¶ 101.

²⁰ See *Order* at ¶ 110.

²¹ See *Order* at ¶ 130.

²² See *id.*

Tele Circuit will obtain a signed certification from the subscriber that meets the certification requirements of 47 C.F.R. § 54.410(d), as amended, as detailed in section C.2 above. The Company will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. Tele Circuit understands that such certifications may be obtained through a written format, an IVR system, or a text message, and will use one or more of such options for its certifications.²³

Alternatively, where a database containing consumer eligibility data is available, Tele Circuit (or state agency or third-party, where applicable) will instead query the database by the end of 2012 and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification. If a subscriber's address cannot be verified through the state data, Tele Circuit will contact the subscriber every year during the annual certification process to obtain a valid address.²⁴ After 2012, Tele Circuit will continue to annually certify the continued eligibility of its entire subscriber base, either by accessing a qualifying database, or by electing to have USAC administer the self-certification process on the Company's behalf.²⁵

Tele Circuit will certify its compliance with Commission rules on an annual Lifeline eligible telecommunications carrier certification form and when submitting FCC Forms 497 to USAC for reimbursement. As part of Tele Circuit's submission of re-certification data pursuant to 47 C.F.R. § 54.416, an officer of the Company will certify annually to USAC:

(1) that the Company has procedures in place to review consumers' documentation of income-and program-based eligibility. In instances where the Company confirms consumer eligibility by relying on official program eligibility data, such as a state or federal database, an officer of the Company will attest to what data the Company

²³ See Order at ¶ 132.

²⁴ See Order at ¶ 131.

²⁵ See Order at ¶ 133.

uses to confirm consumer eligibility in each state, and

(2) that the Company is in compliance with all federal Lifeline certification procedures.²⁶

D. Other Reforms to Eliminate Waste, Fraud and Abuse

Tele Circuit shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent Company customers from engaging in such abuse of the program, inadvertently or intentionally.

Tele Circuit has implemented enrollment procedures designed to prevent subsidies for duplicate, ineligible, or inactive subscribers. The Company contracts with a third party Lifeline service bureau, currently CGM, LLC of Roswell, Georgia, to edit all subsidy request data. CGM will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described herein, Tele Circuit ensures that it does not over-request from support funds.

For each applicant, Tele Circuit first validates the applicant's identity via a government issued ID card, passport, etc. Additionally, as mentioned above, Tele Circuit requires the applicant to provide their date of birth (DOB) and last four digits of their social security number (SSN). Requiring DOB and SSN ensures that neither the applicant nor the Company representative can forge certification forms based on false names and addresses. Once the applicant's identity is

²⁶ See *Order* at ¶ 126-27.

confirmed, Tele Circuit verifies that the applicant is eligible to receive the Lifeline subsidy. To do this, Tele Circuit checks any available eligibility database. If one is not available, the applicant is required to provide proof of participation in one of the Lifeline eligible programs or proof that their annual household income is at or below 135% of the federal poverty guidelines. This prevents ineligible applicants from receiving the subsidy.

Tele Circuit verifies the address of the applicant first via the applicant's government issued ID, then validates the address via a USPS/Melissa Database to ensure the address is correct. Simultaneously, the name/address combination is dipped into CGM's aggregate duplicate database to confirm that the applicant is not already receiving a Lifeline subsidy from Tele Circuit or any other CGM client. This is done through an API connection between the Company's provisioning platform and CGM. This then prompts the representative to detail the one-per-household rule with the applicant.

1. National Lifeline Accountability Database

Tele Circuit will participate in the National Lifeline Accountability Database, once it is established. As required by the *Order*, Tele Circuit will provide to the database subscriber name, address, phone number, the last four digits of Social Security number, date of birth, Lifeline service initiation and de-enrollment date (when applicable), and amount of federal Lifeline support being sought for that subscriber.²⁷ Tele Circuit will provide the information listed above for existing subscribers within 60 days of Commission notice that the database is capable of accepting subscriber information.²⁸

Furthermore, Tele Circuit will obtain acknowledgement and consent from each of its subscribers that is written in clear, easily understandable language that the subscriber's name,

²⁷ See *Order* at ¶ 189.

²⁸ See *Order* at ¶ 190.

telephone number, and address will be divulged to USAC (the administrator of the program) and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit.²⁹

Within 30 days following Commission notice that the database is capable of accepting queries, Tele Circuit will query the database to check to see if a prospective subscriber is already receiving service from another ETC at a residential address prior to seeking reimbursement from the Fund.³⁰

2. Subscriber Usage

Tele Circuit will not seek reimbursement from the USF for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service by the subscriber. Furthermore, Tele Circuit will not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period.³¹ Tele Circuit will notify its subscribers at service initiation, at a minimum via the certification form, about the non-transferability of the phone service, its usage requirements, and the de-enrollment and deactivation that will result following non-usage in any 60-day period of time.³² An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to an existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.³³ Tele Circuit utilizes tracking software to notify the customer if the customer has not used their service for more than

²⁹ See Order, Appendix C.

³⁰ See Order at ¶ 203.

³¹ See Order at ¶ 257.

³² See *id.*

³³ See Order at ¶ 261.

30 or 60 consecutive days. Furthermore, a third party contractor validates the Company's subsidy data to prevent a subsidy request for customers that are inactive under the Company's non-usage policy.³⁴ After notification, if the customer fails to use the phone, it is automatically de-enrolled pursuant to the procedures outlined in section E below. Tele Circuit will continue to comply with applicable public safety, including transmitting 911 calls to the appropriate PSAP even if the Company is no longer providing Lifeline service to a consumer.³⁵

3. Marketing & Outreach

Tele Circuit will implement the measures outlined herein to help ensure that only eligible consumers enroll in the program and that those consumers are fully informed of the limitations of the program, so as to prevent duplicative or otherwise ineligible service as well as other forms of waste, fraud, and abuse. Tele Circuit will emphasize the one-per-household restriction in its direct sales contact with potential customers and in its marketing materials. Tele Circuit will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service:³⁶ (1) the offering is a Lifeline-supported service; (2) only eligible consumers may enroll in the program; (3) the program is limited to one benefit per household, consisting of either wireline or wireless service; and (4) Lifeline is a government benefit program. Tele Circuit's website and printed collateral will explain the documentation necessary for enrollment, and the details of Tele Circuit's plans. Such collateral and website information, as well as its application, will make clear that consumers who willfully make false statements in

³⁴ CGM, LLC is currently the Company's third party contractor.

³⁵ See *Order* at ¶ 262. 911 transmission will actually be performed by the Company's underlying facilities-based CMRS provider.

³⁶ See Exhibit B for a sample advertisement. The Company understands the term "marketing materials" includes materials in all media, including but not limited to print, audio, video, Internet (including email, web, and social networking media), and outdoor signage, that describe the Lifeline-supported service offering, including application and certification forms. See *Order* at ¶ 275.

order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.³⁷ For broadcast advertisements and outdoor signs, and any other situation in which inclusion of documentation information and warnings against willful false statements are not practicable, Tele Circuit will include the URL link for its website where disclosures will be listed. Additionally, Tele Circuit will disclose the company name under which it does business.³⁸

4. Audits

If Tele Circuit draws \$5 million or more in the aggregate on an annual basis from the low-income program, as determined on a holding company basis taking into account all operating companies and affiliates, the Company will hire an independent licensed certified public accounting firm to conduct a biennial audit according to government accounting standards to assess Tele Circuit's overall compliance with the program's requirements.³⁹ Tele Circuit will comply with applicable rules regarding the dissemination of audit findings to the Commission, USAC, and relevant state and Tribal governments within 30 days upon issuance.⁴⁰

E. De-Enrollment

Tele Circuit will de-enroll consumers from the Company's Lifeline program in the following instances, according to C.F.R. § 54.405(e):

Ineligibility. Any subscriber who indicates that he or she is receiving more than one Lifeline-supported service per household, or neglects to make the required one-per-household certification on his or her certification form, will be de-enrolled from Lifeline pursuant to the process for resolving duplicative Lifeline subscriptions described in section 54.405(e)(2).⁴¹

If a customer does not respond to the Company's annual verification survey within 30 days, or if

³⁷ See Order at ¶ 275.

³⁸ See *id.*

³⁹ See Order at ¶ 291.

⁴⁰ See Order at ¶ 294.

⁴¹ See Order at ¶ 122.

Tele Circuit has reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria (including instances where a subscriber informs the Company or the state that he or she is ineligible for Lifeline), Tele Circuit will provide a written notice of impending service termination to the subscriber and then give the subscriber 30 days after the date of the letter to demonstrate that his or her Lifeline service should not be terminated.⁴² Similarly, Tele Circuit will de-enroll a subscriber if they fail to respond to the Company's attempt to verify a temporary address within 30 days.⁴³

Duplicative Support. Subject to USAC's Duplicate Resolution Process and anticipated Duplicate Scrubbing Process,⁴⁴ Tele Circuit will de-enroll a subscriber within 5 business days if the Company is informed by USAC that the subscriber is receiving Lifeline service from another ETC or that more than one member of a subscriber's household is receiving Lifeline service.

Non-Usage. Tele Circuit will de-enroll any subscriber that has not used the Company's Lifeline service for 60 consecutive days, as discussed in section IV.B above. Tele Circuit will provide the subscriber 30 days' notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage; such notice may be initiated after 30-days of non-usage. Tele Circuit will update the national database, once in place, within one business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.⁴⁵

F. Additional Rule Amendments

1. Terms and Conditions of Service

The Company's Lifeline offering is summarized in section IV.C below. The Company's

⁴² See *id.* In states that have dispute resolution procedures applicable to Lifeline termination, the Company will comply with the state requirements.

⁴³ See Order at ¶ 89.

⁴⁴ See Order at ¶ 214-16.

⁴⁵ See Order at ¶ 257.

Lifeline terms and conditions are subject to change as needed, and the most current version will be maintained on the Company's website, www.telecircuit.com/wireless, which is currently under construction.

2. Reporting Requirements

Tele Circuit will report all information required by section 54.422, including as it may heretofore be amended. This includes the names of the Company's holding company, operating companies and affiliates, and any branding ("doing-business-as company" or brand designation), and provide to the Commission and USAC general information regarding the terms and conditions of the Lifeline plans for voice telephony service offered specifically for low income consumers through the program offered during the previous year, including the number of minutes provided, and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.⁴⁶

3. Reimbursement from USAC

In seeking reimbursement for Lifeline, Tele Circuit will comply with the requirements of C.F.R § 54.407, as revised by the *Order*.⁴⁷ Tele Circuit will certify when seeking reimbursement that the Company has obtained a valid certification form for each consumer for whom the Company seeks Lifeline reimbursement,⁴⁸ and the Company will seek reimbursement for actual lines served, not projected lines.⁴⁹

4. Section 54.202 Certifications

Tele Circuit certifies the following in accordance with newly amended C.F.R. § 54.202: (1)

⁴⁶ See *Order* at ¶ 296, 390. Section 153 of the Communications Act defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person."

⁴⁷ See *Order* page 221.

⁴⁸ See *Order* at ¶ 128.

⁴⁹ See *Order* at ¶ 302.

Tele Circuit will comply with the service requirements applicable to the support that it receives; (2) Tele Circuit is able to remain functional in emergency situations; (3) Tele Circuit will satisfy applicable consumer protection and service quality standards.

IV. COMPANY INFORMATION

Tele Circuit is a Georgia corporation. Tele Circuit will provide prepaid wireless telecommunications services to consumers by using the network of its underlying carrier(s), currently Sprint Spectrum L.P. (“Sprint”). Sprint is a nationwide carrier that provides wholesale capacity on its wireless network to resellers like Tele Circuit. Tele Circuit will obtain from Sprint, either directly or through an authorized reseller, the network infrastructure and transmission facilities to allow Tele Circuit to operate as a Mobile Virtual Network Operator (“MVNO”).

A. Names and Identifiers

Tele Circuit does not have a holding company, operating company, or any affiliates, and operates under and identifies itself as Tele Circuit Network Corporation.

B. Financial and Technical Capability

Tele Circuit is financially and technically capable of providing Lifeline-supported services.⁵⁰ Tele Circuit has been providing telecommunications services for five years and provides service to both Lifeline and non-Lifeline customers. Tele Circuit currently provides wireline services in Alabama, Arizona, Colorado, Florida, Georgia, Illinois, New York, Massachusetts, Michigan, Minnesota, Missouri, New Jersey, North Carolina, Oklahoma, Texas, Utah, Virginia, and Wisconsin. Tele Circuit has not been subject to enforcement action or ETC revocation proceedings in any state. Tele Circuit is financially able to provide Lifeline-supported services and will not rely exclusively on USF disbursements to operate. Furthermore, the senior management of Tele Circuit has great depth in the telecommunications industry and offers extensive telecommunications

⁵⁰ See *Order* at ¶ 387.

business technical and managerial expertise to the Company.⁵¹ Tele Circuit will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carrier.

C. Lifeline Offering

Tele Circuit will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying carrier, currently Sprint. As summarized in Exhibit D attached hereto, the Company's Lifeline offering will provide customers with 250 anytime prepaid minutes per month at no charge. Lifeline customers will have the capability of purchasing additional bundles of minutes in denominations as low as \$5, \$10, and \$20.⁵² Text messaging will be available at the rate of one minute (1 text = 1 minute of usage). In addition to free voice services, Tele Circuit's Lifeline plan will include a free handset and the following Custom Calling features at no charge: Voicemail, Caller-ID, and Call waiting. Tele Circuit does not impose burdensome credit checks or long-term service contracts. Calls to customer service will be free, and customers may use their minutes to place domestic long distance calls at no additional charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

⁵¹ See Exhibit C for key management resumes.

⁵² \$5 = 35 minutes, \$10 = 75 minutes, \$20 = 160 minutes, \$30 = 270 minutes, and \$50 = 700 minutes.

V. CONCLUSION

Tele Circuit submits that its Compliance Plan fully satisfies the conditions of forbearance set forth in the Commission's *Order*. Implementation of the procedures described herein will promote public safety and should ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the Company's Lifeline services. Accordingly, Tele Circuit respectfully requests that the Commission expeditiously approve its Compliance Plan so that the Company may begin providing the benefits of much-needed Lifeline service to qualifying low-income consumers as quickly as possible.

Respectfully submitted,

Tele Circuit Network Corporation

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005
(770) 232-9200

Its Counsel

Dated April 2, 2012

Exhibit A

Sample Lifeline Certification Form

TELECIRCUIT LIFELINE APPLICATION (GA)

- LIFELINE IS A FEDERAL BENEFIT
- BY LAW, LIFELINE IS ONLY AVAILABLE FOR ONE PHONE PER HOUSEHOLD, EITHER LAND LINE OR WIRELESS; A HOUSEHOLD CANNOT RECEIVE BENEFITS FROM MULTIPLE PROVIDERS
- A HOUSEHOLD IS DEFINED, FOR PURPOSES OF THE LIFELINE PROGRAM, AS ANY INDIVIDUAL OR GROUP OF INDIVIDUALS WHO LIVE TOGETHER AT THE SAME ADDRESS AND SHARE INCOME AND EXPENSES

I hereby certify that I participate in a minimum of one of the following programs:

___ Food Stamps ___ Federal Public Housing Assistance (FPHA) ___ Medicaid ___ Supplemental Security Income (SSI)
___ Temporary Assistance to Needy Families (TANF) ___ Low Income Home Energy Assistance Program (LIHEAP)
___ National School Lunch Program (free) ___ Senior Citizen low-income discount plan offered by the local gas or power company

Last Name: _____ First Name: _____ MI _____

Residence Street/Apt No. (NO P.O. Box) _____ City: _____ State: ___ Zip Code: _____

This address is ☐ Permanent ☐ Temporary ☐ Multi-Household

Billing Street/Apt No. _____ City: _____ State: ___ Zip Code: _____

Contact Phone Number: _____ Last 4 Digits of SSN#: _____ Birth Date: _____

PENALTY OF PERJURY

Under Title 18 U.S.C. §1621, whoever will state as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both.

I certify under penalty of perjury that:

I understand that Lifeline assistance is available for only one residential wired phone line per household or one wireless phone per household (i.e. not both). I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the lifeline program, and could result in criminal prosecution by the United States Government.

To the best of my knowledge, neither I nor anyone in my household currently receives landline or wireless Lifeline service.

I will notify Tele Circuit within thirty (30) days if I no longer qualify for Lifeline.

I understand that if my service goes unused for sixty (60) days, my service will be suspended, subject to a thirty (30) day period during which I may use the service or contact Tele Circuit to confirm that I want to continue receiving their service.

I will notify Tele Circuit within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Tele Circuit every ninety (90) days. If I fail to respond to Tele Circuit's address verification attempts within thirty (30) days, my Tele Circuit Lifeline service may be terminated.

I understand that Tele Circuit will contact me each year to re-certify my continued eligibility for Lifeline. If I fail re-certify my eligibility within thirty (30) days, it will result in the termination of my Tele Circuit Lifeline service.

I understand that it is a violation of federal and state law to rent, sell, or give away Tele Circuit Lifeline Service and that I certify that I will only use this phone for my household's own use and will not resell it.

I authorize Telecircuit or its duly appointed representative(s) to: 1) access any records contained in any governmental or commercial database to verify my statements herein to; 2) confirm eligibility and/or continued eligibility for Lifeline assistance; 3) to validate, confirm or update my address; and 4) authorize social service agency representatives to discuss with and/or provide information to Tele Circuit verifying my participation in benefit programs or income levels that qualify me for Lifeline assistance.

___ CHECK HERE THAT YOU HAVE READ AND AGREE TO ALL OF THE STATEMENTS ABOVE. Signing below, I acknowledge that the information contained on this form is true and correct the best of my knowledge and belief and providing false or fraudulent documentation in order to receive government assistance is punishable by law.

APPLICANT'S SIGNATURE

DATE

FOR OFFICE USE ONLY:

Company Representative: _____

Documentation Verified: _____

Signature: _____

Date: _____

Exhibit B

Sample Advertisement

Revised 03//14/12
Visual

Graphic:

Government Assisted
Cell Phone Service
FREE phone and FREE minutes

Roll the graphic:

Food Stamps
Housing Assistance
Medicaid
Supplemental Security Income
Low Income Home Energy Assistance Program
Temporary Assistance for Needy Families
National School Lunch Program (Free program)
Senior citizen low-income discount plan offered by
local gas or power company

Graphic:

FREE Cell Phone
FREE Minutes
FREE Long Distance

No Deposit
No Credit Check
(call for details - Sprint service areas only)

Graphic:

FREE cell phone
FREE minutes each month

**Graphic continuously at
the bottom of the screen**

1-800-738-0057
www.telecircuit.com/wireless

Lifeline is a government-supported service available only to eligible consumers. Documentation required for proof of eligibility. Only one benefit per family/household. Customers willfully making false statements concerning benefits can be punished by fine or imprisonment or can be barred from the program. Terms and conditions apply. Talk to a customer service representative for more information or visit www.telecircuit.com/wireless.

Audio

Are you currently receiving any type of government assistance?

If so, you may qualify for Lifeline, a government benefit program, so you can receive a free cell phone and 250 free minutes each month

Call today to see if you qualify for your free cell phone with 250 free minutes each month. There is no credit check and no deposit.

Call today at 1-800-738-0057.

Exhibit C

Key Management Resumes

Thomas E. Allen

1901 S. Palmetto Ave
South Daytona, FL 32119
386-212-0212
tommy@telecircuit.com

Education Lanier High School Macon, GA - Graduated 1970
Mercer University, Macon, GA - Graduated 1974
Bachelor of Arts Degree
Major: Business Administration

Experience

Chief Operations Officer, September 2008 - Present **Tele Circuit Network Corp Alpharetta, GA**

In concert with the CEO, work to establish an annual operations execution plan and to maintain "best practices and processes" in the office.

In concert with the CEO, work to effectively managing their assigned human resources, included but not limited to recruitment, hiring, training, performance reviews/rewards, progressive discipline issues and compensation plans.

Work with CEO to establish and coordinate arrangements for regular regional meetings including preparation of meeting agenda and materials.

Promoting growth and goodwill for the company through daily personal contact with agents and other outside individuals and organizations, and through attendance staff meetings, community meetings, and trade associations.

Carrying out supervisory responsibilities in accordance with the organization's policies and applicable laws.

Performing interviewing and training of employees; planning, assigning, and directing work; appraising performance; rewarding and disciplining employees; addressing complaints and resolving problems.

President, 1991 - 2007 **Deland Actel, Inc Daytona Beach, FL**

I recruited, trained and managed the sales and marketing team selling telecommunication services and equipment directly to businesses and individuals. As of August 1999 upon receiving CLEC certification, operated a prepaid Competitive Local Exchange Carrier with service offered in GA and FL with as many as 5000 customers. Was responsible for technical implementation of telecommunications services as well as regulatory and tariff issues with each state public utilities commission. Managed customer service departments that regularly dealt with customer service issues. Regularly reviewed expense and reimbursement reports, budgets and reviewed financial statements and reports.

Vice President, 1978 - 1991
Actel Communications Macon, GA

As an Authorized Service Representative for BellSouth Telecommunications, I recruited, trained and managed the sales and marketing team selling telecommunication services and equipment directly to businesses and individuals. Developed training manuals and technical instructions to use by the sales people. Instituted account management systems and trained on sales techniques. Developed sales forecasts along with service and pricing plans.

Susan R. Mulhall

1568 N. Woodland Blvd.
Deland, FL 32720
386-734-0057
susan@telecircuit.com

Education Briarcliff High School, Briarcliff Manor NY

Experience 1995-2000 Actel Deland Actel, Inc. Deland, FL
Bookkeeper-Office Manager
Cellular Service & Equipment retail sales
Trained and Managed sales staff
Full Charge Bookkeeper
Sales and Communication tax reporting and remittances
Responsible for provisioning in Bellsouth system

2000 - 2007 Actel Wireless, Inc Deland, FL
President - General Manager
I recruited, trained and managed the sales and marketing team selling telecommunication services and equipment directly to businesses and individuals. Upon receiving CLEC certification, operated a prepaid Competitive Local Exchange Carrier with service offered in FL.
Was responsible for technical implementation of telecommunications services as well as regulatory and tariff issues with each state public utilities commission. Managed customer service departments that regularly dealt with customer service issues. Regularly reviewed expense and reimbursement reports, budgets and reviewed financial statements and reports.
Responsible for all provisioning in Sprint system.
Report and follow up on repair issues.
Sales & Communication Tax reporting and remittance.
Cellular Service & Equipment retail sales

2007-Present Tele Circuit Network, Inc Alpharetta, GA
Provisioning Manager
Responsible for Provisioning in Bell South, Embarq, Verizon and Windstream systems.
Report and follow up on repair issues.
Resolve errors on provisioning orders
Assist customer service as needed

Career Objective

A challenging position in customer services and provisioning

Education

Bachelor of Arts, Political Science, June 1999

University of Georgia, Athens, Georgia

Advance diploma in Computer Sciences, July 2000

Professional Experiences

Customer Services, Nov 2001-September 20,2002

Kroger, USA Alpharetta, G,A, 30022

Responsibilities

- Creating and configure customers databases and history using application software. Maintaining and create inner-circle and business files as well working on member's resale And exempt files
- Enter data and build inventory skew numbers on system, also work on merchandise Pickups
- Working on tails to handle cash, deposits, even exchange and refunds staff. Maintain Ledger for monthly range of profits and loss
- Performed cashier function for Treasury Department, handling and maintaining records daily cash on hand. Performed General ledger entry to appropriate accounts.
- Stop-payment and wire transfers,

Membership Services/ Customer Services Jan2002-September 20,2002

BJ'S wholesale Club, USA, Cummings, G,A,

Responsibilities

- Acquired comprehensive product line Knowledge and ability to quickly assess customer needs and develop full services product and service offerings
- Sought new business by calling on potential customers and sending them mass mailings
- Maintained client information system by creating, updating and deleting client's database
- Managed and organized material for various training sessions including materials for trainers
- Prepared and organized office files, documents invoices and kept track of schedule of events

Administrative Assistant, July 1999-Oct 2001

Citibank, Atlanta, Georgia

- Responsible for managing, analyzing, authorizing personal loans, auto loans and credit cards.
- Trained temporary staff and new hire replacements in journal entry, meeting standards for timeliness and accuracy and integrating new employees into the unit and train The sales executives
- Interviewed for possible appointments of executives and customer service representatives Managing staff appointments and terminations
- Authorized personal loans, auto loans and credit cards for members
- Sought new business by calling on potential customers and sending them mass mailings
- Arranged meeting between clients and sales executives
- Offered various deals for potential clients

Technical Skills

Software Installation, Application Software for account management, Application Management, and Data Entry Techniques

Operating Systems: MS Windows {95/98/2000} Dos and {NT, Novell} Database

Software Installation: Data Entry Techniques, and Computer Assembling

Web Tools: Netscape Communicator, Internet explorer, HTML

Office Tools: MS Offices, MS Power point, MS outlook Express, MS FoxPro

Ashar Syed

Summary of Expertise

A software developer with over 9 years of product development, business development, marketing management and software consulting experience. Solid reputation as a strategic visionary, and problem solver. Strong ability to develop and motivate teams. Performance-oriented with experience in profit and loss management. Skilled in executive level presentations, vendor relationships, and strategic partnerships. Extensive technical expertise in telecommunication software development, data communication technologies, and Internet applications.

Professional Experience

Chairman and CEO, October 2003 - Present

Tele Circuit Network Corp. Alpharetta, GA

Created a long-distance telecommunication company that has been in operation for one and half year. Consultant to several telecommunication, software development and professional services companies on content and product support strategies, vertical market development, business partnership deal structures and customer acquisition. Conceived, developed and brought telecom services to market such as calling card, T1s, DSL and long-distance. Designed user interfaces and telephony applications. Delivered technology assessments and evaluations for training, knowledge ware and groupware applications. Negotiated licensing and joint venture agreements. Established pricing policies. Designed and executed advertising, direct mail and telemarketing campaigns for Tele Circuit.

Technical Manager, July 1999 – September 2003

America's Tele-Network Corp. Roswell, GA

Responsible for managing, analyzing, designing, implementation, testing and maintaining of **GUIs, Telephony, Internet, Intranet, Extranet and Database Systems** related to telecommunications industry. **Provide application modeling and programming expertise in building software and hardware solutions for maintenance and management of Voice Processing, Customer Service and Billing systems** using **C++, MFC, Dialogic SDK, Green Leaf, Visual Voice, COM, ActiveX Controls, SQL Sever, MS Access.**

- Providing technical skills of strategic network planning for data transfer between different offices at other locations.
- Supervised and developed file processing and on-line communication system with different long distance carriers like, AT&T, QWest, Sprint, and MCI-WorldCom.
- Analyzed, designed, implemented and maintaining **Automated Telephone Dialer System** using **Object-Oriented** methodologies, which is being used as the main sales, marketing and advertising tool. Automatically dial customers from lead pool, record voices, process them and response to the customers questions analytically. This **Multithreaded System** is operated on a **Digital Dialogic Card** and implemented using **MFC, C++, Visual Voice, Dialogic SDK, MS Access and SQL Server.**
- Analyzed and designed **Client-Server Architecture** for customer services named QuickLink. This **Two-Tier** application is being by all customer service representatives to process customer complaints and requests. The presentation tier was modeled using **UML** and its architecture is based on **COM Components** and **Object-Oriented** technology. It was implemented using **C++, ASP, MFC, JavaScript, DLLs, ActiveX**

Education

Master of Telecommunications Management, December 2002
Keller Graduate Institute of Technology, Alpharetta, Georgia

Master of Science, Computer Science, April 1998
University of South Alabama, Mobile, Alabama

Master of Science, Computer Science, September 1995
Quaid-e-Azam University, Islamabad, Pakistan

Certified Internet Web Associate, June 2000



References available on request

Exhibit D

Proposed Lifeline Rate Plan

Lifeline 250 Minutes Plan - \$0

250 anytime minutes per month

- Free handset
- Free Voicemail, Caller-ID, Call waiting
- Free calls to Customer Service
- Free calls to 911 emergency services
- 1 text message = 1 minute of usage

Additional bundles of minutes available:

\$5 = 35 minutes

\$10 = 75 minutes

\$20 = 160 minutes

\$30 = 270 minutes

\$50 = 700 minutes